

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

A PLACE FOR MOM, INC., a Delaware  
corporation,

Plaintiff,

v.

LISA PERKINS, an individual,

Defendant.

CASE NO. C20-1028-JCC

ORDER

This matter comes before the Court on the parties' stipulation and joint motion for a permanent injunction, dismissal of all claims and counterclaims with prejudice, and entry of final judgment (Dkt. No. 61). The Court hereby GRANTS the parties' motion (Dkt. No. 61) and orders as follow:

1. From the date of entry of this Order through June 1, 2021, Defendant Lisa Perkins is restrained and enjoined from:

a. Soliciting or accepting any senior living referrals from any A Place for Mom, Inc. ("APFM") referral source identified in Exhibit A to the parties' stipulation (the "Restricted List").

i. The inclusion of an entity on the Restricted List shall cover and include:  
(1) the entity, including all locations if a company with multiple locations

1 and any other entities related by common ownership or management, and  
2 (2) any employees or representatives of the listed entity.

3 ii. If any of the referral sources covered by the Restricted List contact Ms.  
4 Perkins about senior living referrals, she must tell such source(s) that she  
5 cannot assist or do business with them through June 1, 2021, and either (1)  
6 terminate the call/contact, or (2) refer them to APFM for assistance with  
7 senior living referrals. Ms. Perkins is prohibited from assisting with such  
8 potential referrals in any way, and from referring referral sources covered  
9 by the Restricted List to anyone other than APFM for help with senior  
10 living referrals.

11 b. Soliciting or encouraging any APFM employee to leave APFM and/or join any  
12 other company, including but not limited to any company in the senior living  
13 referral industry.

14 2. All claims and counterclaims in this action are hereby DISMISSED with  
15 prejudice and without an award of fees or costs to either party, except that such dismissal will not  
16 prohibit a subsequent action by APFM to enforce any provision of this Order.

17 Accordingly, the Clerk is directed to CLOSE this case.

18 DATED this 5th day of October 2020.

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22 John C. Coughenour  
23 UNITED STATES DISTRICT JUDGE  
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